

# Statement of Expert's Time

## Engineer Jaime A. Umpierre, P.E.

### ADR vs Ports Authority

Date	Description	Time (Hours)
11/6/07	Interview with Attorney Palomares	1
11/8/07	Interview with plaintiff's client regarding accessibility issues of ferry vessels and terminals	0.75
11/19/04	Visit to Fajardo Terminal for a preliminary inspection	4.50
11/21/04 to 11/23/04	Preliminary inspection analysis and preparation of report	8.00
11/25/04	Conference with attorney Palomares regarding preliminary inspection issues found during inspection	1
12/6/04	Presentation and discussion with plaintiff's client of findings during preliminary inspection	1
12/8/04	Review and organization of documents to submit draft of preliminary report to attorney Palomares	1.25
12/11/04	Delivery of preliminary inspection final report to attorney Palomares	1
1/08/2005	Review & Revision of final prel - report with attorney Palomares	1.5
	Subtotal: Preliminary Inspection	20
1/12/05	Research and review Civil Engineering Reference Manual, Michael R. Lindeburg, P.E., 6 <sup>th</sup> Ed; ACI (American Concrete Institute) 318-02 Building Code Requirements for Structural Concrete, 2002; Notes on ACI 318-02 with Design Applications, PCA (Portland Cement Association); 1987 Uniform Building Code Volumes 1, 2 & 3; Puerto Rico Building Code 1999; <i>Reglamento de Zonificación de Puerto Rico, Junta de Planificación del Estado Libre Asociado de Puerto Rico, Oficina de la Gobernadora, Vigencia 5 de noviembre de 2000</i>	4.5
1/14/05	Continue Research and Review of above codes, standards and practices	2.5
3/16/2005	Teleconference with attorney Palomares	1
11/19/2005	Conference with attorney Palomares: review Plaintiffs' Second Amended Complaint	2.5
12/8/2005	Review exchange of documents from attorneys William D. Tucker and Lorenzo Palomares	1.25
04/04/2006	Conference with attorney Palomares for case status	0.5
4/8/06 to 4/11/06	Research interplay of shoreside facility and vessel accessibility standards; review of documents Passenger Vessel Access Advisory Committee, "Recommendations for Accessibility Guidelines for Passenger Vessels: Final Report", December 2000; Draft Passenger Vessel Accessibility Guidelines and Supplementary Information, November 26, 2004	12
4/13/2006	Meeting with attorney Palomares, exchange of comments and case status	1.25

9/ 9/ 2006	Teleconference with attorney Palomares	.25
9/12/2006	Teleconference with attorney Palomares inspections shoreside facilities and vessels	.25
9/13/2006	Teleconference with attorney Palomares inspections shoreside facilities and vessels	.25
9/ 15/2006	Teleconference with attorney Palomares inspections shoreside facilities and vessels	.25
9/18/2006	Teleconference with attorney Palomares inspections shoreside facilities and vessels	.25
9/20/2006	Teleconference with attorney Palomares inspections shoreside facilities and vessels	.25
10/11/2006	Conference with plaintiffs' attorney to coordinate inspection dates for marine terminals and vessels	.50
10/27/2006	Conference with attorney Palomares regarding inspections dates	0.75
11/2/06 to 11/8/06	Review of Code of Federal Regulations, Title 28, Part 36; American National Standards ICC/ANSI A117.1-1998; ANSI 156.19-1984; 302 National Fire Protection Association (NFPA) Codes and Standards, 1998 Edition	16
11/29/06	T/C with plaintiffs' counselors	0.5
12/1/06	Conferences with expert engineer Chapman and plaintiffs' counsel	1
12/4/06	Teleconference with plaintiffs' counselors regarding accessibility issues of ferry vessels, terminals, and case status	2
12/8/06	Teleconference with counselors regarding inspections and engineer Chapman: coordinations for inspection	2
12/9/06 to 12/12/06	Pre - inspection meeting with attorney Palomares and engineer Chapman (12/10/06 – 4 hrs) Inspection of Marine Terminals and Vessels: Fajardo, Vieques and Culebra – 50 hrsa	54.00
1/10/7 to 2/23/07	Preparation of report: draft, review, discussion with plaintiffs' consultants and engineer Chapman, final report delivery	31.75
2/8/07	Teleconference with attorney Palomares	0.25
2/22/07 to 2/28/07	Teleconferences with Chapman, Palomares and Tucker, review draft and final vessel inspection accessibility reports. Changes of report, done during discussion	8
3/1/07 to 3/4/07	Conferences with plaintiffs' counsel and with expert Chapman concerning reports of accessible route issues at shoreside terminal facilities; Numerous T/C with plaintiffs' counsel and experts Umpierre and Chapman concerning same; Receipt and review multiple draft reports and final Report	9.25
3/26/2007	Conf. Client regarding accessibility issues of ferry vessels, terminals, and case status ; T/C with plaintiffs' counsel expert Umpierre concerning proposed consent decree	3
5/12/07	Review of engineer Chapman's letter of comments and recommended actions taken by PRPA	3
6/15/07	Preparation for and attendance at status conference. T/C experts Chapman Umpierre	2

6/25/07	Review and discussion of PRMTA reports with engineer Chapman and attorney Palomares	2.00
6/26/07	Conference with engineer Chapman related to documents of PRMTA on response to vessels and marine terminals issues. Conference with attorney Palomares related to Escobar report #1 dated 6-15-07; Escobar report 2 dated 6-15-07	3.5
6/27/07	Coordinations by e-mail with engineer Chapman for T/C of Greg Beer's vessels' reports	0.5
6/28/07	Meeting with experts of defendant to discuss marine terminal issues	4
7/2/07	Review of minute for June 28 meeting	1.5
7/28/07	Evaluation of PRMTA vessels and marine terminals reports against plaintiff's experts' reports	3.75
8/3/07	Conference with Palomares and Chapman to discuss disagreement issues related to PRMTA marine terminals and vessels reports	2.75
8/18/07	Review draft of Consent Decree	2.75
9/3/07	Teleconference with Palomares to review and discuss areas of agreement and disagreement concerning Consent Decree	2.75
9/20/07	Conference with Palomares concerning preparation for 10/9/07 evidentiary hearing	1.5
9/21/07	Conference with Palomares concerning evidentiary hearing and as to areas of agreement and disagreement concerning Consent Decree	.75
9/28/07	Conference with Palomares concerning evidentiary hearing and as to areas of agreement and disagreement concerning Consent Decree	.50
10/2/07	Conference with Palomares concerning evidentiary hearing and as to areas of agreement and disagreement concerning Consent Decree	.50
10/3/07	Conference with Palomares regarding evidentiary hearing	0.5
10/4/07	Conference with Palomares and Tucker in preparation to evidentiary hearing	.50
10/15/07	Teleconference with plaintiffs' counsel and Chapman as to areas of agreement and disagreement concerning Consent Decree, preparation for 12/20/07, evidentiary hearing	1.25
10/16/07	T/C with plaintiffs' counsel and Chapman as to areas of agreement and disagreement concerning Consent Decree, preparation for 12/20/07, evidentiary hearing	0.5
10/22/07	Conf. Client regarding accessibility issues of ferry vessels, terminals, and case status	1.5
10/28/07	T/C with plaintiffs' counselors	0.25
10/29/07	Conference with plaintiff's client regarding accessibility issues of ferry vessels, terminals, and case status	1.5

10/31/07	Teleconference with plaintiffs' counsel and expert Chapman as to areas of agreement and disagreement concerning Consent Decree, preparation for 12/20/07, evidentiary hearing	.50
11/2/07	Teleconference with plaintiffs' counsel regarding areas of agreement and disagreement concerning Consent Decree, preparation for 12/11/07 settlement conference and 12/20/07, evidentiary hearing	.25
11/5/07	Teleconference with plaintiffs' counsel and experts Chapman and Umpierre as to areas of agreement and disagreement concerning Consent Decree, preparation for 12/11/07 settlement conference and 12/20/07 evidentiary hearing	.25
11/7/07	Teleconference with plaintiffs' counsel and experts Chapman and Umpierre as to areas of agreement and disagreement concerning Consent Decree, preparation for 12/11/07 settlement conference and 12/20/07, evidentiary hearing.	.50
11/11/07	Teleconference with plaintiffs' counsel	0.25
11/21/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.25
11/22/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.25
11/25/07	Conference with plaintiffs' counsel	0.25
11/27/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.25
11/28/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.75
11/30/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.25
12/1/07	Teleconference with plaintiffs' counsel in preparation to 12/11/07 settlement conference and 12/20/07, evidentiary hearing	0.25
12/12/07	Teleconference with plaintiffs' counsel in preparation to 12/20/07, evidentiary hearing	0.25
12/18/07	Conferences with plaintiffs' counsel regarding areas of agreement and disagreement concerning Consent Decree	0.5
12/20/2007	Teleconferences with plaintiffs' counsel for final Consent Decree	3.75
	<b>TOTAL</b>	223